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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 23-cr-20474

Plaintiff,

Hon. Shalina D. Kumar  
United States District Judge

v.

YUSEF D. HAIRSTON,

Defendant.

Violations:

18 U.S.C. § 922(a)(4)

18 U.S.C. § 922(o)

18 U.S.C. § 933(a)(1)

18 U.S.C. § 3147

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**FIRST SUPERSEDING INDICTMENT**

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**FILED**  
OCT 04 2023  
U.S. DISTRICT COURT  
FLINT, MICHIGAN

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**ILLEGAL POSSESSION AND TRANSFER OF A MACHINEGUN**

**18 U.S.C. § 922(o)**

On or about June 8, 2023, in the Eastern District of Michigan, YUSEF D. HAIRSTON knowingly possessed and transferred a machinegun, that is, eleven machinegun conversion devices, also known as “Glock switches,” a part designed and intended solely and exclusively to convert a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o).

**COUNT TWO**  
**ILLEGAL TRAFFICKING IN FIREARMS**  
**18 U.S.C. § 933(a)(1)**

On or about the June 8, 2023, in the Eastern District of Michigan, YUSEF D. HAIRSTON knowingly shipped, transported, transferred, cause to be transported, or otherwise disposed of a firearm, that is, eleven machinegun conversion devices, also known as “Glock switches,” to Individual-1 in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by Individual-1 would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1).

**COUNT THREE**  
**TRANSPORTING PROHIBITED WEAPONS WITHOUT A LICENSE**  
**18 U.S.C. § 922(a)(4)**

On or about June 27, 2023, in the Eastern District of Michigan and elsewhere, YUSEF D. HAIRSTON, not being a licensed dealer, importer, manufacturer, and collector of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly transported and caused to be transported in foreign commerce from the People’s Republic of China to the United States, a machinegun, as defined in 26 U.S.C. § 5845(b), that is, fifty-one machinegun conversion devices, also known as “Glock switches,” without the specific authorization of the Attorney General, in violation of Title 18, United States Code, Sections 922(a)(4) and 924(a)(1)(B).

**COUNT FOUR**  
**ILLEGAL POSSESSION AND TRANSFER OF A MACHINEGUN**  
**18 U.S.C. § 922(o)**

On or about July 21, 2023, in the Eastern District of Michigan, YUSEF D. HAIRSTON knowingly possessed and transferred a machinegun, that is, fifty-one machinegun conversion devices, also known as “Glock switches,” a part designed and intended solely and exclusively to convert a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o).

**COUNT FIVE**  
**ILLEGAL TRAFFICKING IN FIREARMS**  
**18 U.S.C. § 933(a)(1)**

On or about the July 21, 2023, in the Eastern District of Michigan, YUSEF D. HAIRSTON knowingly shipped, transported, transferred, cause to be transported, or otherwise disposed of a firearm, that is, fifty-one machinegun conversion devices, also known as “Glock switches,” to Individual-1 in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by Individual-1 would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1).

**COUNT SIX**  
**ILLEGAL POSSESSION AND TRANSFER OF A MACHINEGUN**  
**18 U.S.C. § 922(o)**

On or about October 1, 2023, in the Eastern District of Michigan, YUSEF D. HAIRSTON knowingly possessed and transferred a machinegun, that is, thirty-two machinegun conversion devices, including twenty drop-in auto sears and twelve “Glock switches,” parts designed and intended solely and exclusively to convert a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o).

On or about August 3, 2023, in the United States District Court for the Eastern District of Michigan, YUSEF D. HAIRSTON was placed on pretrial release in the case of *United States v. Yusef D. Hairston*, Case No. 23-cr-20474, pursuant to an order under chapter 207 of Title 18 of the United States Code, which order notified HAIRSTON of the potential effect of committing a federal offense while on pretrial release. On or about October 1, 2023, HAIRSTON knowingly possessed and transferred a machinegun, in violation of 18 U.S.C. § 922(o), as alleged above.

All in violation of Title 18, United States Code, Section 3147.

**FORFEITURE ALLEGATIONS**

The allegations contained in Count Six of this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby gives notice to the defendant of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; all property involved in, or property traceable to, the violations alleged in this Superseding Indictment.

**THIS IS A TRUE BILL.**

Dated: October 4, 2023

s/GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

s/ANTHONY P. VANCE  
ANTHONY P. VANCE  
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P61148

**Companion Case information MUST be completed by AUSA and initialed.**

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	Case Number 23-CR-20474
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <b>APV</b>

Case Title: USA v. YUSEF D. HAIRSTONCounty where offense occurred : GENESEECheck One: ☒ Felony ☐ Misdemeanor ☐ Petty☐ Indictment/ ☐ Information --- no prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**Superseding to Case No: 23-CR-20474Judge: Shalina D. Kumar

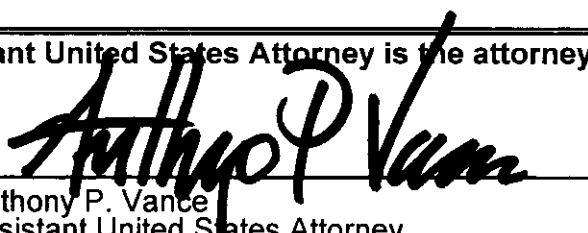
- ☐ Original case was terminated; no additional charges or defendants.  
☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☒ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameCharges  
18 U.S.C. § 922(o)Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 4, 2023

Date

  
 Anthony P. Vance  
 Assistant United States Attorney  
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 Flint, Michigan 48502  
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 P61148

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.